

LAW OFFICE OF  
**BENJAMIN SILVERMAN**  
224 WEST 30TH ST., SUITE 302  
NEW YORK, NY 10001

TEL (212) 203-8074  
FAX (646) 843-3938  
Benjamin@bsilvermanlaw.com

June 16, 2022

**By ECF**

Honorable Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *United States v. Donnell Bruns*, 21 Cr. 499 (PAE)

Your Honor:

I represent Donnell Bruns in the above-captioned case and I write respectfully to request that his bond be modified to remove the curfew and electronic monitoring condition. Pretrial Services consents to this request and the government takes no position. The reason for the request is that Mr. Bruns' job at a shelter on Randall's Island often asks him to work "mandated" overtime, *i.e.*, overtime hours sprung on employees at the last minute when they are already on the clock. That is impossible for Mr. Bruns with a curfew because he works evenings and it is already too late in the day for him to contact his Pretrial Officer to amend the curfew.

Mr. Bruns was released on August 13, 2021, on a \$50,000 bond signed by two financially responsible persons and conditions including home incarceration, electronic monitoring, and drug treatment. The Court reduced home incarceration to home detention on October 25, 2021. Dkt. 71. The Court then reduced home detention to a curfew on February 11, 2022. Dkt. 115. Mr. Bruns has remained fully compliant as restrictions have loosened; he completed a drug program; and he is employed full time.

I conferred with and Pretrial Officer Joshua Rothman, who consents to removing the curfew and electronic monitoring condition, noting that Mr. Bruns has been fully compliant since his release, has held a job for several months, was successfully discharged from his drug treatment program, "appears to be on the right track," and has "done everything asked of him while on bail." Assistant United States Attorney Kedar Bhatia informs me that the government takes no position.

For the foregoing reasons, I respectfully request that the Court endorse this letter to modify Mr. Bruns' bond to remove the curfew and electronic monitoring conditions.

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Thank you for your consideration.

Respectfully submitted,

/s/ Benjamin Silverman  
Benjamin Silverman

cc: Counsel of record (by ECF)  
Pretrial Officer Joshua Rothman (by email)

**GRANTED.** The Clerk of Court is requested to terminate the motion at Dkt. No. 151.

6/17/2022

SO ORDERED.

  
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PAUL A. ENGELMAYER  
United States District Judge